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April 13, 2020

Via ECF

The Honorable Martin Glenn
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *In re Foreign Economic Industrial Bank Ltd.* (Case No. 16-13534-MG);
In re Larisa Markus (Case No. 19-10096-MG).
DIA v. LARMAR, et al. (Adv. Proc. Case No. 19-01413-MG);
Rozhkov v. LARMAR, et al. (Adv. Proc. Case No. 19-01414-MG).

Dear Judge Glenn:

We are writing to bring certain inconsistencies in Mr. Singer's April 11, 2020 letter to the Court's attention.

Mr. Singer claims he cannot produce the Steblin and BG Atlantic/Granik documents because they are in folders in his office. But, as Your Honor may remember, we learned of these documents based on electronic searches on the Protax server from the Tozzi Declaration filed by Mr. Singer. *See Tozzi Declaration, Markus* ECF 155, Ex. A, attached. These documents exist in electronic form and were already accessed by Protax's ediscovery vendor Tozzi.

Respectfully, Judge Vyskocil and Your Honor have made clear that Mr. Singer's status as a sole practitioner should not be used to delay discovery. Ediscovery production continues throughout this District.

We thank Your Honor for his attention to this matter.

Sincerely,

/s/ *Bruce S. Marks*

For: Marks & Sokolov LLC

Attachment